



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/NIS/MCM
F. #2019R00029

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 5, 2019

By Federal Express

Douglas C. Anton, Esq.
Three University Plaza Drive, Suite 407
Hackensack, New Jersey 07601

Re: United States v. Robert Sylvester Kelly
Criminal Docket No. 19-286 (S-2) (AMD)

Dear Mr. Anton:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This letter supplements the government's previous productions by letters dated August 15, 2019 and October 16, 2019. The government also renews its request for reciprocal discovery from the defendant.

I. The Government's Discovery

A. Documents and Tangible Objects

Please find enclosed a CD that contains the following items.¹ These items are subject to the terms of the protective order entered by the Court on or about August 13, 2019.

¹ The references herein to Jane Doe #1 refer to the individual identified as Jane Doe #1 in the second superseding indictment, returned today (the "Operative Indictment"). The references herein to Jane Doe #4 and Jane Doe #5 also refer to the individuals identified as Jane Doe #4 and Jane Doe #5 in the Operative Indictment. These individuals were previously identified as Jane Doe #3 and Jane Doe #4, respectively, in prior indictments.

<u>Discovery Exhibit</u>	<u>Description</u>
90	Cook County Clerk's Office marriage records for Robert Kelly and Jane Doe #1
91	Wayne County Clerk's Office annulment records for Robert Kelly and Jane Doe #1
92	Birth certificate for Jane Doe #1
93	Illinois Department of Human Services records
94	Illinois Secretary of State driving and auto records for Robert Kelly
94a	Business Records Certification for Discovery Exhibit 94
95	Birth certificate for Jane Doe #4
96	Photographs taken by the Chicago Police Department on or about February 11, 2002 and June 7, 2002
97	Albany Police Department records for a concert held on August 31, 1994
97a	Business Records Certification for Discovery Exhibit 97
98	Resorts World Casino New York City records for a concert held on August 26, 2016
99	Metropolitan Correctional Center Chicago records for Robert Kelly and another inmate
100	Southwest Airlines records for air travel on August 16, 2016, September 12, 2016, November 17, 2018 and November 20, 2018 for various individuals
100a	Business Records Certification for Discovery Exhibit 100
101	American Airlines records for air travel on December 22, 2013, March 26, 2014, April 12, 2016, April 13, 2016, October 28, 2016, December 15, 2017 and February 5, 2018 for various individuals
101a	Business Records Certification for Discovery Exhibit 101
102	United Airlines records for travel on September 23, 2016, October 10, 2017 and October 11, 2017
102a	Business Records Certification for Discovery Exhibit 102

103	Southwest airlines records for July 16, 2015 for various individuals including Jane Doe #5
104	JP Morgan Chase records
104a	Business Records Certification for Discovery Exhibit 104
105	First Midwest Bank records
106	JP Morgan Chase records
106a	Business Records Certification for Discovery Exhibit 106
107	Bank of America records for RSK Enterprises LLC and Somebrotherluv LLC
107a	Business Records Certification for Discovery Exhibit 107
108	Illinois Secretary of State records for Sombrotherluv LLC
108a	Business Records Certification Discovery for Exhibit 108
109	Georgia Secretary of State records for RSK Enterprises LLC
110	Delaware Secretary of State records for RSK Enterprises LLC
110a	Business Records Certification for Discovery Exhibit 110
111	Bank records provided by Jane Doe #4
112	Florida Department of Transportation records
113	Illinois Tollway records
113a	Business Records Certification for Discovery Exhibit 113
114	Riverlink records
115	Port Authority of New York and New Jersey records
115a	Business Records Certification for Discovery Exhibit 115

You may examine the physical evidence discoverable under Rule 16, including original documents, by calling the undersigned to arrange a mutually convenient time.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Elizabeth A. Geddes
Elizabeth A. Geddes
Nadia Shihata
Maria Cruz Melendez
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (AMD) (by ECF) (without enclosures)